

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

CHRISTOPHER SEAMAN and ELIZABETH
ALLISON LYONS, individually and on behalf
of C.S., a minor; *et al.*

Plaintiffs,

v.

The COMMONWEALTH OF VIRGINIA; *et al.*

Defendants.

Case No. 3:22-cv-00006-NKM

**PLAINTIFFS' MOTION TO FILE EXHIBITS ATTACHED TO
MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION
UNDER SEAL**

Pursuant to Local Rule 9, Plaintiffs Christopher Seaman and Elizabeth Allison Lyons, individually and on behalf of C.S., a minor; Tasha Nelson, individually and on behalf of J.N., a minor; Elizabeth Burnett, individually and on behalf of B.B., a minor; Lindsey Dougherty, individually and on behalf of G.D., a minor; Meghan Dufrain and Roch Dufrain, individually and on behalf of J.D., a minor; Denille Francis, individually and on behalf of Q.O., a minor; Brian Mulligan and Lori Dooley, individually and on behalf of R.M., a minor; Kimberly Crawley, individually and on behalf of I.C., a minor; L.W., individually and on behalf of C.B., a minor; K.R., individually and on behalf of L.R., a minor; S.K., individually and on behalf of M.K., a minor; and R.M., individually and on behalf of J.M., a minor (collectively, "Plaintiffs") respectfully move the Court for an order sealing Exhibits 9, 10, and 11, and their attachments, attachments A and B to Exhibit 3, and attachment A to Exhibit 5, which have been submitted with the Memorandum in Support of Plaintiffs' Motion for Temporary Restraining Order and

Preliminary Injunction. A copy of the Exhibits and Attachments to be filed under seal are being sent to the Clerk's Office in a sealed envelope marked as such. In support of this Motion, Plaintiffs file a Memorandum in Support, a Notice of Sealing Motion, and a Proposed Order in accordance with Local Rule 9.

Dated: February 10, 2022

Respectfully submitted,

/s/ Eden B. Heilman

Eden B. Heilman (Va. Bar No. 93554)
Matthew Callahan (*pro hac vice* to be filed)
Monique Gillum (*pro hac vice* to be filed)
American Civil Liberties Union (ACLU)
Foundation of Virginia
701 E. Franklin St., Suite 1412
Richmond, VA 23219
Tel: (804) 644-8022
Fax: (804) 649-2733
eheilman@acluva.org
mcallahan@acluva.org
mgillum@acluva.org

Eve L. Hill (VA Bar # 96799)
Sharon Krevor-Weisbaum (*pro hac vice* to be filed)
Jessica Weber (*pro hac vice* to be filed)
Brown Goldstein Levy LLP
120 E. Baltimore Street, Suite 2500
Baltimore, MD 21202
Tel: (410) 962-1030
Fax: (410) 385-0869
EHill@browngold.com
skw@browngold.com
jweber@browngold.com

Steven M. Traubert (Va. Bar #41128)
Kerry M. Chilton (Va. Bar #90621)
disAbility Law Center of Virginia
1512 Willow Lawn Drive, Suite 100
Richmond, Virginia 23230
(804)225-2042
steven.traubert@dLCV.org

kerry.chilton@dLCV.org

Ian S. Hoffman (VA Bar #75002)
John A. Freedman (*pro hac vice* to be filed)
Arnold & Porter Kaye Scholer LLP
601 Massachusetts Ave., N.W.
Washington, DC 20001
Tel: (202) 942-5000
Fax: (202) 942-5999
Ian.Hoffman@arnoldporter.com
John.Freedamn@arnoldporter.com

Kaitlin Banner (*pro hac vice* to be filed)
Margaret Hart (*pro hac vice* to be filed)
Marja K. Plater (*pro hac vice* to be filed)
WASHINGTON LAWYERS'
COMMITTEE FOR CIVIL RIGHTS AND
URBAN AFFAIRS 700 14th Street, NW, Suite 400
Washington, DC 20005 Phone: (202) 319-1000
Fax: (202) 319-1010
kaitlin_banner@washlaw.org
margaret_hart@washlaw.org
marja_plater@washlaw.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of February 2022, I filed the foregoing document with the Clerk of Court using the CM/ECF system, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Commonwealth of Virginia
Secretary of the Commonwealth
1111 E. Broad St., #4
Richmond, VA 23219

Governor Glenn Youngkin
Office of the Governor
P.O. Box 1475
Richmond, VA 23218

Attorney General Jason Miyares
Office of the Attorney General
202 North Ninth Street
Richmond, VA 23219

Jillian Balow
Virginia Superintendent of Public Instruction
James Monroe Building
101 N. 14th Street
Richmond, VA 23219

Colin Greene
Acting Virginia Health Commissioner
Virginia Department of Health
109 Governor Street
Richmond, VA 23219

/s/ Eve L. Hill
Eve L. Hill (VA Bar # 96799)
Brown Goldstein Levy LLP
120 E. Baltimore Street, Suite 2500
Baltimore, MD 21202

Counsel for Plaintiffs